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7

8 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

9 CESAR MARTINEZ MORAN,

10 Plaintiffs,

11 v.

12 UR M. JADDOU, Director of U.S.
13 Citizenship and Immigration Services;
RICHARD MURRAY, Field Office
14 Director for U.S. Citizenship and
Immigration Services, Reno Office; and
15 JOHN DOE,

16 Defendants.

Case No. 2:23-cv-01771-CDS-EJY

Stipulation and Order

(First Request)

18 Plaintiff Cesar Martinez Moran and Defendants Ur M. Jaddou, Director of United
19 States Citizenship and Immigration Services and Richard Murray, Field Office Director for
20 United States Citizenship and Immigration Services, Reno Office (“Federal Defendants”),
21 hereby stipulate and agree as follows:

22 Plaintiffs filed their Complaint on October 31, 2023.

23 Plaintiffs served the United States with a copy of the Summons and Complaint via
24 Certified Mail on December 12, 2023.

25 The current deadline for the United States to respond to the Plaintiffs’ Complaint is
26 on February 12, 2024.

27 On February 2, 2024, counsel for Plaintiff and Federal Defendants and counsel for
28 the United States Citizenship and Immigration Services had a meet and confer to discuss

1 the present case during which they agreed that an additional 180 days will be needed for
2 the United States Citizenship and Immigration Services to adjudicate Plaintiff's
3 application.

4 Accordingly, the parties, through undersigned counsel, stipulate and request that the
5 Court approve a 180-day extension of time, from February 12, 2024, to August 12, 2024,
6 for Federal Defendants to file a response to the Complaint, ECF No. 1. This is the first
7 request for an extension of time.

8 This stipulated request is filed in good faith and not for the purposes of undue delay.

9 Respectfully submitted this 8th day of February 2024.

10 GWP IMMIGRATION LAW

JASON M. FRIERSON
United States Attorney

12 /s/ Kathia Quiros
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15 *Attorney for Plaintiff*

/s/ Virginia T. Tomova
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16 IT IS SO ORDERED:

17 
18 Clayton L. Zouchal
19 UNITED STATES MAGISTRATE JUDGE

20 DATED: February 8, 2024